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Objections Date: January 6, 2011 at 4:00 p.m.
Hearing Date: January 13, 2011 at 10:00 a.m.

Attorneys for Intervening Class Members

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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LEHMAN BROTHERS HOLDINGS INC., <i>et</i>	:	Case No. 08-13555-JMP
<i>al.</i> ,	:	
	:	Chapter 11
Debtor.	:	
<hr/>		:
LEHMAN BROTHERS SPECIAL	:	
FINANCING INC.,	:	
	:	Adversary Proceeding
Plaintiff,	:	No. 09-01242-JMP
	:	
vs.	:	
	:	
BNY CORPORATE TRUSTEE SERVICES	:	
LIMITED,	:	
	:	
Defendant.	:	
<hr/>		X

DECLARATION OF JASON C. DAVIS IN SUPPORT OF LIMITED OBJECTION OF THE
MINIBOND NOTEHOLDERS TO DEBTORS' MOTION PURSUANT TO SECTION 105(A)
OF THE BANKRUPTCY CODE AND GENERAL ORDER M-390 FOR AUTHORIZATION
TO IMPLEMENT ALTERNATIVE DISPUTE RESOLUTION PROCEDURES FOR
AFFIRMATIVE CLAIMS OF DEBTORS UNDER DERIVATIVES TRANSACTIONS WITH
SPECIAL PURPOSE VEHICLE COUNTERPARTIES

I, JASON C. DAVIS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the States of California, New York and this Bankruptcy Court. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, one of the counsel of record for plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: *In re Lehman Brothers Holdings Inc., et al.*, Case No. 08-13555 (JMP), Stipulation and Order Regarding Wong Objection to Derivatives Procedures Orders (S.D.N.Y. Bankr. Ct. Sept. 22, 2009); and

Exhibit B: *Wong v. HSBC USA, Inc., et al.*, No. 10 Civ. 0017 (WHP), slip op. (S.D.N.Y. Aug. 9, 2010).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this January 6, 2011, at San Francisco, California.

s/ Jason C. Davis

JASON C. DAVIS